

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ABRAHAM GUR and JORGE MALDONADO,	:	
on behalf of themselves and on behalf of all other	:	
similarly situated persons,	:	Civil Action No. 13-cv-3330 (PKC) (VVP)
	:	
Plaintiffs,	:	
	:	<u>NOTICE OF MOTION</u>
v.	:	
	:	
BEN'S LUXURY CAR AND LIMOUSINE	:	
SERVICE, INC., HENRY ZILBERMAN,	:	
ABRAHAM MZOUZ, AND PINHAS GADI,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that pursuant to 29 U.S.C. § 216(b), Plaintiffs Abraham Gur and Jorge Maldonado (together, "Plaintiffs"), on behalf of themselves individually and on behalf of all similarly situated persons, will move this Court, at the United States Courthouse located at 225 Cadman Plaza East, Brooklyn, NY 11201, before the Honorable Pamela K. Chen, on a date at a time to be designated by the Court, for an order: (1) granting conditional certification of Plaintiffs' claims under the Fair Labor Standards Act, (2) authorizing Plaintiffs to send notice of this action and a consent form to members of the putative collective, (3) directing Defendants to provide Plaintiffs with the name, address, phone number, email address and dates of employment for the members of the putative collective, (4) approving the posting of the notice in a conspicuous location at Defendants' place of business, and (5) awarding Plaintiffs such other and further relief that the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), Defendants' opposition papers are due by or before August 6, 2013; and Plaintiffs' reply papers are due by or before August 13, 2013. Oral argument will be scheduled, if necessary, at a date and time designated by the Court.

Dated: July 24, 2013
New York, New York

Respectfully submitted,

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*Attorneys for Plaintiffs
and the Putative Collective*